

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
Civil Action No.: 1:23-cv-00423-WO-JLW

TIMIA CHAPLIN, KEVIN SPRUILL,  
ROTESHA MCNEIL, QIANA ROBERTSON,  
YOUSEF JALLAL, MESSIEJAH BRADLEY,  
PAULINO CASTELLANOS, ROBERT LEWIS  
AND ALLEN SIFFORD, on behalf of  
themselves and all others  
similarly situated,

Plaintiffs,

v.

WILLIE R. ROWE, in his capacity as  
Sheriff of Wake County, BRIAN  
ESTES, in his official capacity as  
the Sheriff of Lee County, THE  
OHIO CASUALTY INSURANCE COMPANY,  
as the surety for the Sheriff of  
Wake County and as surety for the  
Sheriff of Lee County, TYLER  
TECHNOLOGIES, INC., NORTH CAROLINA  
ADMINISTRATIVE OFFICE OF THE  
COURTS, RYAN BOYCE, in his  
official capacity as the Executive  
Director of the North Carolina  
Administrative Office of the  
Courts, BRAD FOWLER, in his  
official capacity as the ecourts  
Executive Sponsor and Chief  
Business Officer of the North  
Carolina Administrative Office of  
the Courts, BLAIR WILLIAMS, in his  
official capacity as the Wake  
County Clerk of Superior Court,  
SUSIE K. THOMAS, in her official  
capacity as the Lee County Clerk  
of Superior Court, JOHN DOE

TYLER TECHNOLOGIES, INC.'S  
CONSENT MOTION FOR EXTENSION  
OF TIME TO RESPOND TO FIRST  
AMENDED COMPLAINT

**SURETY, as the surety for the Wake  
County Clerk of Superior Court and  
the Lee County Clerk of Superior  
Court, and DOES 1 THROUGH 20,  
INCLUSIVE,**

**Defendants.**

Pursuant to Local Rule 6.1(a) and Rule 6(b) of the Federal Rules of Civil Procedure, Defendant Tyler Technologies, Inc. ("Tyler Technologies"), moves this Court for a thirty-day extension of time, through and including December 13, 2023, to answer or otherwise respond to Plaintiffs' First Amended Complaint - Class Action ("First Amended Complaint"). In support of this motion, Tyler Technologies states the following:

1. Plaintiffs filed their original complaint on May 23, 2023.

2. Tyler Technologies timely filed its Motion to Dismiss the Complaint on September 20, 2023.

3. Plaintiffs filed motions seeking to extend the time by which they were required to respond to the motions to dismiss filed by Tyler Technologies and the other defendants. Plaintiffs sought, and were granted, an

extension of time of up to thirty-six days from their original response deadlines. (See, e.g., ECF No. 17, 18, 21).

4. Plaintiffs filed their First Amended Complaint on October 27, 2023. Service on this date would result in a response date of November 13, 2023.

5. The time within which Tyler Technologies must answer or otherwise respond to the First Amended Complaint has not expired.

6. Tyler Technologies requests an extension of time to respond to the First Amended Complaint. Plaintiffs' First Amended Complaint adds seven new named plaintiffs and six new defendants to this litigation. The First Amended Complaint also adds additional allegations, including allegations about the seven new named plaintiffs and new factual allegations against Tyler Technologies. The requested extension will facilitate Tyler Technologies' preparation of a focused response to these new allegations and new plaintiffs.

7. Furthermore, lead counsel for Tyler Technologies has long-scheduled international travel plans for November

3-10, 2023, and will, therefore, be out of the country for much of the time leading up to the current deadline in which to file a response. The requested extension takes into account this conflict as well as the upcoming Thanksgiving holidays.

8. This Motion is made in good faith and not for the purpose of undue delay.

9. Tyler Technologies' counsel has conferred with the Plaintiffs' counsel, and Plaintiffs' counsel consents to the requested extension.

10. Tyler Technologies reserves all defenses, claims and arguments.

WHEREFORE, Tyler Technologies respectfully requests the Court extend by thirty days Tyler Technologies' deadline to answer or otherwise respond to the First Amended Complaint, through and including December 13, 2023.

This 2nd day of November, 2023.

s/ Gregory L. Skidmore  
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Technologies, Inc.*